

In the Drawings:

The attached sheets of drawings include changes to FIGs. 28-31.

Annotated Sheets showing the changes are attached along with the Replacement Sheets.

## REMARKS

As a preliminary matter, FIGs. 28-31 are designated as "Prior Art," as suggested by the Examiner. For this reason, withdrawal of the objection of the drawings is respectfully requested.

Claims 13-15 and 18-20 stand rejected under 35 U.S.C. 102(e) as being anticipated by Shimomaki et al. (U.S. Patent No. 6,678,017). Applicants respectfully traverse the rejection because the cited reference fails to disclose (or suggest) a connecting layer electrically connecting a plurality of metal layers directly formed on the same layer.

Shimomaki discloses a jumper line 67 connecting a right edge 12a of a protect ring 12 and a Cr film 57. (See FIGs. 6 and 8). The right edge 12a is directly formed on a glass plate 1, and the Cr film 57 is directly formed on a metal film 56. Accordingly, the right edge 12a and the Cr film 57 are not directly formed on the same layer.

In contrast, the electrostatic element portions recited in independent claims 13-15 have a feature of a connecting layer electrically connecting a plurality of metal layers that are directly formed on the same layer. In one embodiment of the present invention shown in FIG. 23b, two metal layers 200 are directly formed on a gate insulation film 52. The two metal layers 200 are electrically connected by an ITO layer 43, which forms a connecting layer. (See also Applicants' specification pg. 47, lns. 21-26).

Moreover, assuming *arguendo* that the elements 55-57 of Shimada could correspond to the metal layers of the present application, the Cr film 55 is directly formed on a Cr silicide film 58. The Cr film 55 and the right edge 12a are not directly formed on the same layer. Accordingly, the jumper line 67 is not connecting a plurality of metal layers directly formed on the same layer. For all of these reasons, withdrawal of the §102(e) rejection of claims 13-15 and 18-20 is respectfully requested.

Claim 17 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Shimomaki in view of Kim (U.S. Patent No. 6,087,678). In response, Applicants amended independent claim 17 to further recite the feature that a contact resistance between the connecting layer and the metal layer can be increased, and respectfully traverse the rejection based on this amendment.

Kim discloses that a first metal layer 38 is capable of forming a low resistant contact with electrodes, such as a pixel electrode 44a. (See col. 5, lns. 26-28). However, Kim fails to disclose or suggest that a contact resistance between the first metal layer 38 and the pixel electrode 44a can be increased.

In contrast, as discussed in Applicants' specification on page 50, line 15 *et seq.*, an active matrix type liquid crystal display has a contact resistance between the connecting layer and the metal layer that can be increased. More specifically, as recited in claim 21, for example, the contact resistance can be between 35 to 36kOhms. Since Kim fails to disclose or suggest this feature, and Shimomaki fails to disclose or suggest


this feature, the combination of these references also fails to disclose or suggest this feature, and withdrawal of the §103(a) rejection of claim 17 is respectfully requested.

New claim 21 further defines the contact resistance between the connecting layer and the metal layer as being equal to 35 to 36kOhms. Applicants earnestly solicit allowance of new claim 21 for the reasons recited above with respect to the rejection of independent claim 17, and also for the features recited in this claim.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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FIG. 28

PRIOR ART

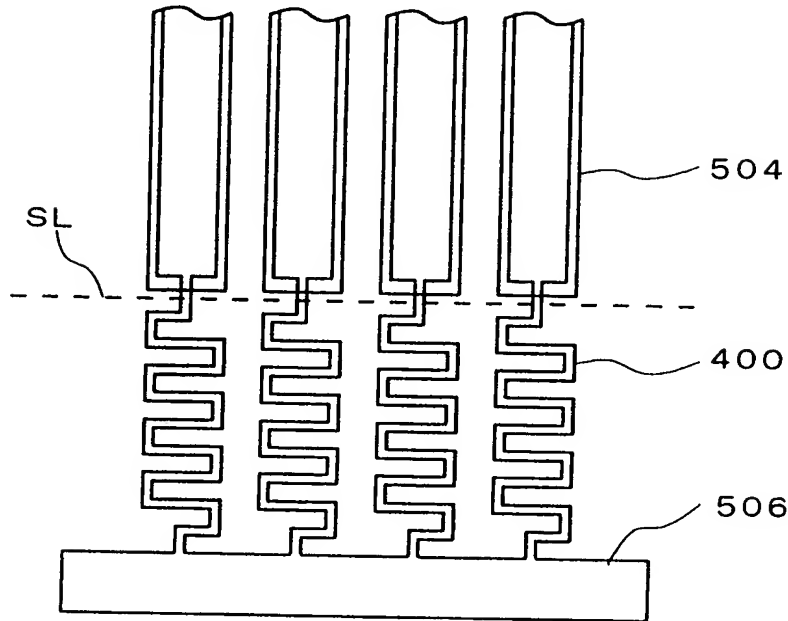


FIG. 29a

PRIOR ART

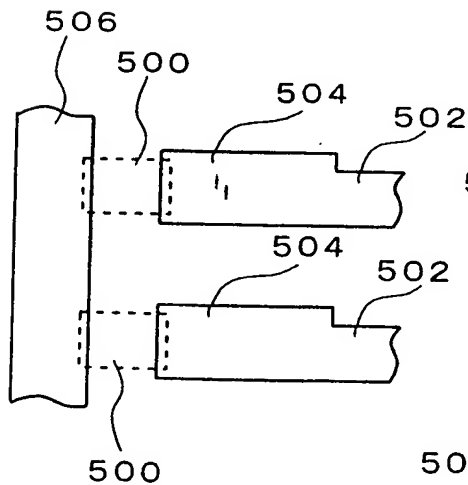
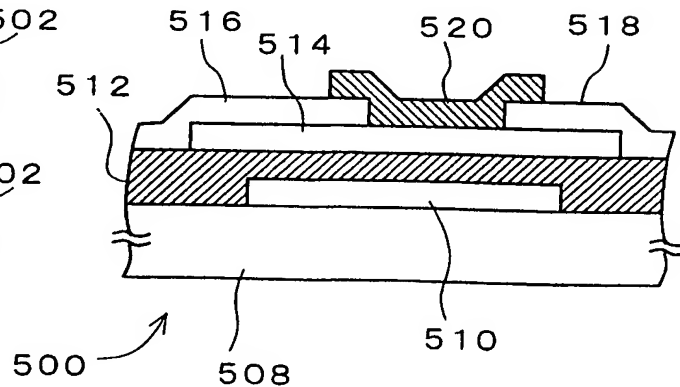


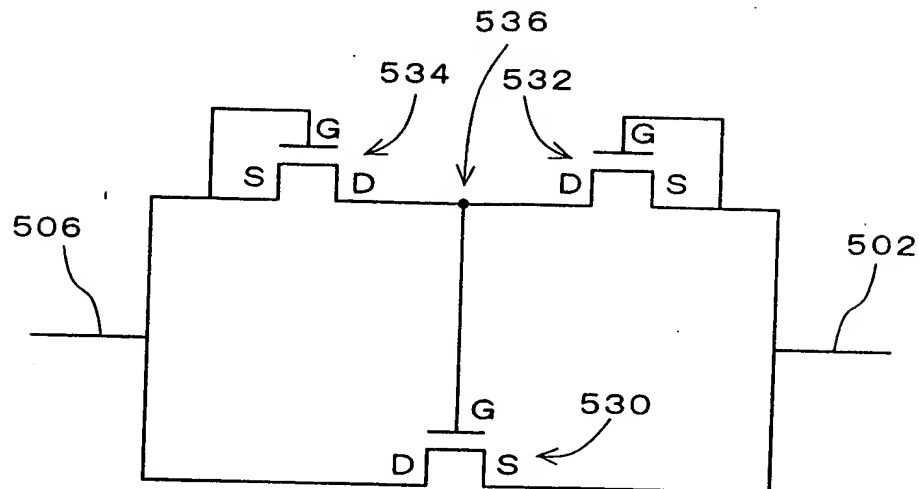
FIG. 29b

PRIOR ART



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**FIG. 30**  
**PRIOR ART**



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**FIG. 31**  
PRIOR ART

